



## Regulatory Return for Consumer Credit: CCR009

### Member Guidance Checklist – December 2025

#### V1.0

### Background

Introduced by the Financial Conduct Authority ([FCA](#)) on the 7<sup>th</sup> May 2025 to replace older forms (CR004 and CR005) and certain aspects of CCR002 and CCR005, CCR009 must be completed by any firms that hold permissions for Credit Brokering, Debt Adjusting and Counselling or firms that provide Credit Information Services.

Firms only need to hold one of these permissions to be required to submit a CCR009 and this must be submitted annually during January, including reporting based on the calendar year (1<sup>st</sup> January to the 31<sup>st</sup> December) rather than the relevant accounting reference date.

Submissions of 2025 data will be due in early 2026 with the FCA currently planning to open the window on the My FCA Portal in late February. For 2026 data onwards, the annual reporting window will open in January yearly. Once the reporting window opens, firms will have 40 business days to submit data.

### What data is collected?

Members who hold permissions to provide services as stated above will need to submit data for:

- Permissions – What regulated activities does your firm carry out?
- Business model – Description of products and services offered.
- Marketing – Approaches used to reach customers i.e. social media and paid ads.
- Revenue – Credit related and non-credit related.
- Staff – Number of staff, any remuneration they receive and how, as well as pay structures.

### Key points to remember:

- The report submission is designed to only show questions or data requests that are relevant to the firm's activities,
- Members with Credit Brokering permissions must submit report CCR009 and the relevant sections for report CCR007,
- CCR007 - 1A to 3A (where these relate to credit broking or not-for-profit debt management activities) can be left blank, however all firms must still complete the remaining fields. Where a firm undertakes additional limited permission activities, you should still report information based on those other activities.

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## Checklist:

1. Have you confirmed which Consumer credit permissions apply to your business and where relevant, to which parts?
  - *Check what permissions you currently hold and what areas of the form you will be required to fill out along with why this information is needed.*  
[CCR009 return – relevant ancillary credit firm | FCA](#)
2. Have you assigned someone responsible for CCR009 within your business and the internal sign-off process required for submission?
  - *Is there a responsible person for gathering information and preparing for the form?*
  - *Is this individual aware of what they need and when this will be due?*
  - *Is this individual aware to look on “My FCA” for updates on the progress of the form and the due date?*
3. Do senior managers understand their responsibilities? Do they know and understand their duties under consumer duty and regulatory reporting?
  - *Do all senior managers understand what will be expected of them and where to send the information required?*
  - *Do they understand why the form has changed?*
4. Are you aware of the reporting frequency to follow and what has changed for your submission?
  - *Have you checked the FCA webpage and understood the reporting dynamics regarding revenue?* [Consumer credit reporting | FCA](#)
5. Have you started to collect the data required? Do your systems pull in information accurately and consistently?
  - *Have you considered areas such as your customer relationship management systems, compliance MI, internal trackers, Facebook posts, paid ads and referrals.*
  - *Have you included any reporting required on Vulnerable Customers?* [credit-agreement-ccr009-data-elements.xlsx](#)
6. Have you prepared for data submissions relating to your funder relationships?
  - *Have you reviewed data on how many introductions you have made, the different finance providers referred to and how this works (direct or via a panel)?*
  - *Can you obtain the required detail on staff roles and the remuneration they receive, along with how it was paid and how many introductions were made?*
  - *Can you evidence incentives complying with consumer duty?*
7. Are you aware of, and able to evidence, the different fees your firm charges and how they are calculated?
  - *Are there any one-off fees to consider, or fees for any extra services provided?*
  - *Can you locate the total revenue of fees within your business and any commission relating to them?*

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8. Have you contacted any third parties or appointed representatives to make them aware of the information you need from them and when you expect it by?
  - *Have you reached out to any Appointed Representatives or other third parties and informed them of what you need from them, by when and where they should send it?*  
[FCA Handbook - SUP 16 Annex 38D Notes for completion of data item relating to relevant ancillary credit firms](#)
9. Have you completed a test of collecting the required data for your submission to ensure it is consistent, accurate and not misleading?
  - *Have you used the FCA data flow tool ([credit-agreement-ccr009-data-elements.xlsx](#)) to complete a test run of filling out the form?*
  - *Has any missing information been found and updated where needed?*
10. Are you aware on how to find, complete and submit the form?
  - *Have you ensured that you can access your 'My FCA' Portal? [Consumer credit reporting / FCA](#)*

## Useful Resources

[Consumer credit reporting | FCA](#)

[FCA Handbook - SUP 16 Annex 38D Notes for completion of data item relating to relevant ancillary credit firms](#)

## Contact

For any further queries or information on the CCR009, please contact [compliance@bvrla.co.uk](mailto:compliance@bvrla.co.uk)

Version	Date	Owner	Approved by
1.0	19 <sup>th</sup> December 2025	BVRLA Compliance	